

memorandum

DATE: September 21, 1994

REPLY TO
ATTN OF:

Office of Environmental Guidance (EH-231):DiCerbo:6-5047

SUBJECT:

Environmental Guidance on CERCLA Removal Actions

to: Distribution

The purpose of this memorandum is to provide Program Offices and Field Organizations with a copy of the attached environmental guidance document entitled: "*CERCLA Removal Actions*." This guidance was developed jointly by the Office of Environmental Restoration, Regulatory Integration Division (EM-431) and the Office of Environmental Guidance, RCRA/CERCLA Division (EH-231) for Departmental personnel with line management or oversight responsibilities in the conduct of CERCLA removal actions at DOE environmental restoration sites.

The attached guidance highlights the statutory and regulatory basis for removal action decision-making pursuant to the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) and the National Oil and Hazardous Substance Pollution Contingency Plan (NCP), respectively. This guidance also provides a comprehensive framework for using removal action authority to take "early action" at DOE environmental restoration sites. The approach taken in this guidance is graphic in nature utilizing a modular format with flowcharts, milestone tables and summary checklists to address the CERCLA removal action process and program requirements.

In preparing this guidance document, a draft version was distributed to select Program Offices and Field Organizations, and the Environmental Protection Agency for review and comment. All comments received have been addressed in preparing the final document, and we believe the input provided by the reviewers has improved the overall quality and utility of this guidance. EM-431 and EH-231 wish to express their appreciation for the comprehensive, professional job that these organizations provided in reviewing this document and assisting us in finalizing the guidance.

Questions concerning the attached guidance document, in particular or CERCLA removal actions, in general, may be directed to Jerry DiCerbo of my staff at (202) 586-5047, or through the INTERNET electronic mail at Gerald.DiCerbo@hq.doe.gov.



Thomas T. Traceski
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Office of Environmental Guidance

Attachment



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REMOVAL ACTIONS
under the
**COMPREHENSIVE ENVIRONMENTAL RESPONSE,
COMPENSATION, AND LIABILITY ACT
(CERCLA)**

SEPTEMBER 1994

Prepared by

U.S. DEPARTMENT OF ENERGY
OFFICE OF ENVIRONMENTAL GUIDANCE
RCRA/CERCLA DIVISION
(EH-231)
Washington, D.C.

Sponsored by

U.S. DEPARTMENT OF ENERGY
OFFICE OF ENVIRONMENTAL RESTORATION
REGULATORY INTEGRATION DIVISION
(EM-431)
Washington, D.C.





For additional copies of this guidance document, call the Environmental Management Information Center at **1-800-7EM-DATA** (1-800-736-3282).

Additional copies also are available to DOE and DOE Contractors from the **Office** of Scientific and Technical Information, P.O. Box 62, Oak Ridge, TN 37831, (615) 576-8401.

Acknowledgments

This guidance document was developed by the U.S. Department of Energy's (DOE's) Office of Environmental Guidance, RCRA/CERCLA Division (EH-231) and the Office of Environmental Restoration, Regulatory Integration Division (EM-43 1). The DOE project leaders were Dr. Jerry DiCerbo, Mr. John Bascietto, and Mr. Claude Magnuson. The project leaders would like to thank the many government and contractor reviewers from DOE Operations and Project Offices, National Laboratories, and the Environmental Protection Agency, who contributed in the preparation of this guidance. Questions concerning document content or use should be directed to Dr. Jerry DiCerbo and/or Mr. John Bascietto, U.S. Department of Energy, at (202) 586-5047, or electronic mail to gerald.dicerbo@hq.doe.gov and/or at (202) 586-7917, or electronic mail to john.bascietto@hq.doe.gov, respectively.

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Flowchart Symbols

Flowcharts are a central element of this guidance. The flowcharts provide step-by-step procedures that should be followed to meet the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Throughout the flowcharts, a series of symbols has been used. All of the flowcharts in this guidance use six symbols; these symbols are as follows:

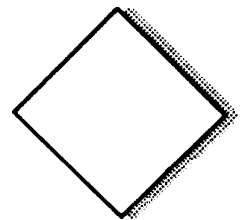
- Ovals represent the beginning of a new flowchart;



- **Solid-Line Rectangles** indicate actions that should be completed;



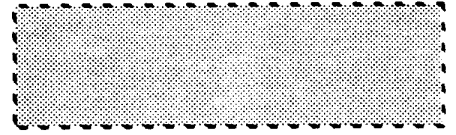
- **Diamonds** represent decision points (evaluate the question contained in the diamond and follow the appropriate path: Yes or No);



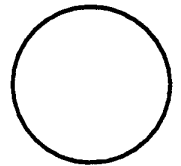
- **Dashed-Line Rectangles** contain notes to the reader about the individual steps that need to be taken in the flowchart;



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- **Shaded, Dashed-Line Rectangles** contain “continued on,” “continued from,” or “proceed to” instructions that direct the reader to different parts of the flowchart or the guidance; and



- **Circles** indicate that the flowchart continues on the next page or continues from the previous page of the flowchart.



List of Acronyms

AEA	Atomic Energy Act
ARARs	Applicable or Relevant and Appropriate Requirements
ATSDR	Agency for Toxic Substances and Disease Registry
ATTIC	Alternative Treatment Technology Information Center
CAA	Clean Air Act
CAAA	Clean Air Act Amendments of 1990
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CFR	Code of Federal Regulations
CRP	Community Relations Plan
CWA	Clean Water Act
DOE	U.S. Department of Energy
DOI	U.S. Department of the Interior
EA/EIS	Environmental Assessment/Environmental Impact Statement
W C A	Engineering Evaluation/Cost Analysis
EHS	Extremely Hazardous Substance
EOC	Emergency Operations Center
EPA	U.S. Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act (Title III of SARA)
ERPM	Environmental Restoration Program Manager
ERT	Environmental Response Team
FEMA	Federal Emergency Management Agency
FFA	Federal Facility Agreement
FFCAct	Federal Facility Compliance Act
FRERP	Federal Radiological Emergency Response Plan
FWPCA	Federal Water Pollution Control Act

HASP	Health and Safety Plan
HAZMAT	Hazardous Materials
HAZWOPER	Hazardous Waste Operations and Emergency Response
HHS	U.S. Department of Health and Human Services
HSWA	Hazardous and Solid Waste Amendments of 1984
IAGs	Interagency Agreements
LEPC	Local Emergency Planning Committee
MOU	Memorandum of Understanding
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEPA	National Environmental Policy Act
NIOSH	National Institute of Occupational Safety and Health
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge and Elimination System
NPL	National Priorities List
NRC	National Response Center
NRT	National Response Team
OPA	Oil Pollution Act of 1990
ORP	U.S. EPA Office of Radiation Programs
ORPS	Occurrence Reporting and Processing System
o s c	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration
OSTI	U.S. DOE Office of Science and Technical Information
OSWER	U.S. EPA Office of Solid Waste and Emergency Response
PA	Preliminary Assessment
PA/SI	Preliminary Assessment/Site Inspection
PCB	Polychlorinated Biphenyl
PIAT	Public Information Assistance Team
POLREP	Pollution Report
PRP	Potentially Responsible Party

PRSC	Post-Removal Site Control
PSO	Program Secretarial Officer
QA/QC	Quality Assurance/Quality Control
QAPP	Quality Assurance Project Plan
RA	Remedial Action
RAT	Radiological Assistance Team
RCP	Regional Contingency Plan
RCRA	Resource Conservation and Recovery Act of 1976
RFA	RCRA Facility Assessment
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
RPM	Remedial Project Manager
RQ	Reportable Quantity
RRT	Regional Response Team
RSE	Removal Site Evaluation
SACM	Superfund Accelerated Cleanup Model
SARA	Superfund Amendments and Reauthorization Act
SERC	State Emergency Response Commission
SI	Site Inspection
SSCs	Scientific Support Coordinators
SWDA	Solid Waste Disposal Act
SWMU	Solid Waste Management Unit
TPQ	Threshold Planning Quantity
TSCA	Toxic Substances Control Act
TSDF	Treatment, Storage, or Disposal Facility
UCNI	Unclassified Controlled Nuclear Information
UMTRCA	Uranium Mill Tailings Radioactive Control Act
USCG	United States Coast Guard
UST	Underground Storage Tank

Glossary

This glossary provides information on the most commonly used terms related specifically to CERCLA removal actions. For a comprehensive listing of CERCLA-related definitions, you should refer to section 300.5 of the National Contingency Plan (40 CFR Part 300).

Action Memorandum	The internal EPA document that serves as a written record of regional or Headquarters approval of Superfund financing of a removal action. An Action Memorandum describes site conditions, including the nature of the release, actual or potential threats, enforcement strategy, and proposed costs and actions. An Action Memorandum is also the appropriate format within EPA for requesting and obtaining Superfund ceiling increases, exemptions to the 12-month and \$2 million limits, and redistribution of funds because of changes in the scope of work. DOE may use the Action Memorandum as a model for documenting DOE removal action decision-making.
Administrative Record File	A collection of documents established in compliance with the requirements set forth in section 113(k) of CERCLA, as amended, consisting of information upon which the CERCLA lead agency bases its decision on the selection of response actions. The Administrative Record file should be established at or near the facility at issue and made available to the public.
Applicable or Relevant and Appropriate Requirements (ARARs)	Those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental, state environmental, or facility siting laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance found at a CERCLA site. Only those state standards that are identified by a state in a timely manner and that are more stringent than federal requirements may be applicable (see NCP section 300.5).
CERCLA Lead Agency	The department or agency designated to coordinate, direct, or monitor federal response actions under Subpart E of the NCP. DOE is the CERCLA Lead Agency when a release is on, or the sole source of the release is from, any facility or vessel under the jurisdiction, custody, or control of DOE.
Community Relations Plan (CRP)	A plan for all responses lasting longer than six months that addresses local citizens' and officials' concerns about a hazardous waste release and integrates community relations activities into the technical response at a site. The CRP should help prevent disruptions and delays in response actions and partially fulfill the National Environmental Policy Act requirement for public notification and participation.

Compliance Agreements	Legally binding agreements between regulators and regulated entities that set standards and schedules for compliance with environmental statutes including Consent Order Compliance Agreements, Federal Facility Agreements, Interagency Agreements required under CERCLA section 120, and Federal Facility Compliance Act Agreements.
Engineering Evaluation/Cost Analysis (EE/CA)	An analysis of removal alternatives for a site, similar to a feasibility study for a remedial action. The EE/CA must be made available for a 30-calendar-day public comment period prior to signing the Action Memorandum.
Environment	The navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States; and any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
Environmental Response Team (ERT)	EPA hazardous waste experts who provide 24-hour technical assistance during all types of emergencies involving releases at hazardous waste sites and spills of hazardous substances. The ERT also provides hazardous site response training for all EPA employees.
Environmental Assessment/ Environmental Impact Statement (EA/EIS)	Documents prepared by DOE federal agencies pursuant to section 102 of NEPA to ensure that environmental amenities and values are given appropriate consideration in decision-making regarding major federal actions affecting the quality of the human environment. The EA provides evidence and analysis for deciding whether to produce the EIS and considers alternatives to the proposed action. If an agency decides not to prepare an EIS, it must make a "Finding of No Significant Impact" available to the public. If an agency decides that preparation of an EIS is appropriate, it first initiates a "scoping" process to obtain early participation by other agencies and the public in planning the EIS, to determine the scope of the EIS, and to determine the significant issues to be discussed in the EIS. An agency then prepares a draft EIS, holds a public comment period, and prepares a final EIS.
Environmental Restoration Program Manager (ERPM)	Refers to the official designated by DOE to coordinate and direct removal or remedial action responses under CERCLA and the NCP. The ERPM, or the ERPM's line organization, is responsible for the performance of duties and functions delegated by the National Contingency Plan to the "Remedial Project Manager" for remedial actions, and the "On-Scene Coordinator" for removal actions.

Extremely Hazardous Substance (EHS)	Any hazardous substance listed in 40 CFR Part 355, Appendices A and B. Facility owners or operators are required to report to the State Emergency Response Commission (SERC) and the Local Emergency Planning Committee (LEPC) the amount of any EHS present at a facility in an amount greater than or equal to 500 pounds or the threshold planning quantity (TPQ), whichever is lower (see 40 CFR Part 370). Immediate notification of the SERC, the LEPC, and EPA or the National Response Center is required in the event of a release of a reportable quantity (RQ) of an EHS from a facility.
Facility	Any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or any site or area where a hazardous substance has been deposited, stored, disposed of, or placed or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.
Facility Manager	Refers to the official designated by DOE as responsible for all activities at a facility.
Federal Facility Agreement (FFA)	See Interagency Agreement.
Federal Facility Compliance Act (FFCA Act)	Amendment to the Resource Conservation and Recovery Act signed in October 1992, to bring all federal facilities into compliance with applicable federal and state hazardous waste laws, to waive Federal Sovereign Immunity under those laws, and to allow the imposition of fines and penalties.

Hazardous Substance	The term “hazardous substance”* means (A) any substance designated pursuant to section 311(b)(2)(A) of the Federal Water Pollution Control Act (FWPCA); (B) any element, compound, mixture, solution, or substance designated pursuant to section 102 of CERCLA; (C) any hazardous waste having the characteristics identified under or listed pursuant to section 2001 of the Solid Waste Disposal Act (SWDA) (but not including any waste the regulation of which, under the SWDA, has been suspended by Act of Congress); (D) any toxic pollutant listed under section 307(a) of the FWPCA; (E) any hazardous air pollutant Listed under section 112 of the Clean Air Act; and (F) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to section 7 of the Toxic Substances Control Act. The term does not include petroleum, including crude oil or any fraction thereof that is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (A) through (F) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
Hazardous Waste Operations and Emergency Response (HAZWOPER)	Regulations established by the Occupational Safety and Health Administration to govern the health and safety of employees engaged in hazardous waste operations and emergency response. The regulations are found in 29 CFR Part 1910.120.
Health and Safety Plan (HASP)	A site plan, required by the HAZWOPER regulations and prepared and followed by any employer whose workers engage in hazardous waste operations, which addresses the safety and health hazards of each phase of site operation and includes the requirements and procedures for employee protection.
Information Repository	A file containing current information, technical reports, and reference documents regarding a CERCLA site. The information repository is usually located in a public building that is convenient for local residents, such as a public school, library, or city hall. The Administrative Record is often a significant portion of the information repository.
interagency Agreement (IAG)	An agreement between federal agencies that outlines cleanup and compliance milestones and roles and responsibilities, and that may indicate specific reporting requirements unique to the agreement. Interagency agreements are required under CERCLA section 120.

Local Emergency Planning Committees (LEPCs)	Appointed by the State Emergency Response Commission, each LEPC prepares a local emergency response plan for the emergency planning district and establishes procedures for receiving and processing requests from the public for information generated by the Emergency Planning and Community Right-to-Know Act (EPCRA) reporting requirements. The LEPC also appoints a chair, establishes rules for itself, and designates a coordinator for information.
National Priorities List (NPL)	The list, compiled by EPA pursuant to CERCLA section 105, of uncontrolled hazardous substance releases in the U.S. that are priorities for long-term remedial evaluation and response.
National Response Team (NRT)	Representatives of 14 federal agencies that coordinate federal responses to nationally significant pollution incidents and provide advice and technical assistance to the responding agency(k).
National Oil and Hazardous Substances Pollution Contingency Plan (NCP)	The NCP, 40 CFR Part 300, outlines the responsibilities and authorities for responding to releases into the environment of hazardous substances and other pollutants and contaminants under the statutory authority of CERCLA and section 311 of the Clean Water Act.
Natural Resources	Land, fish , wildlife, biota, air, water, ground water, drinking water supplies, and other such resources belonging to, managed by, held in trust by, appertaining to, or otherwise controlled by the United States, any state or local government, any foreign government, any Indian Tribe, or, if such resources are subject to a trust restriction on alienation, any member of an Indian Tribe.
Natural Resources Trustees	Federal officials designated by the President to act on behalf of the public as trustees for natural resources when there is injury to, destruction of, loss of, or threat to natural resources as a result of a release of a hazardous substance or a discharge of oil.
Notification Report	A report that describes a reportable occurrence at a DOE-owned or -operated facility, the operating conditions of the facility at the time of the occurrence, the immediate actions taken in response, and the results of those actions, if known. For each reportable occurrence, a Notification Report must be prepared and submitted to DOE before the close of the next business day from the time of categorization of the occurrence.
On Site	The aereal extent of contamination and all suitable areas in very close proximity to the contamination necessary for implementation of a response action (see 40 CFR 300.5).

Petroleum Exclusion	The statutory exclusion of petroleum from the definitions of hazardous substance, or pollutant or contaminant found in CERCLA sections 101(14) and 101(33), respectively, unless otherwise specifically listed or designated as a hazardous substance under CERCLA.
Pollutant or Contaminant	Pollutant or contaminant, as defined by section 101(33) of CERCLA, includes, but is not limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations, in such organisms or their offspring. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under section 101(14)(A) through (F) of CERCLA, nor does it include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas). In conducting a removal action, the term pollutant or contaminant means any pollutant or contaminant that may present an imminent and substantial danger to public health or welfare.
Pollution Reports (POLREPS)	<p>POLREPs are EPA documents that describe removal action activities under CERCLA, oil spill responses under the Oil Pollution Act of 1990 (OPA), and underground storage tank removals under the Resource Conservation and Recovery Act (RCRA). POLREPs comprise initial, progress, special, and final POLREPs. For CERCLA removal actions, POLREPs serve to inform regional management, EPA Headquarters, the Regional Response Team (RRT), the NRT, and the trustees of affected natural resources regarding the:</p> <ul style="list-style-type: none">• Source and circumstances of the release• Potentially response parties (PRPs) identified• Removal actions taken• Costs incurred for the removal actions• Impact and potential impact of the release on public health and welfare, and the environment.
Post-Removal Site Control (PRSC)	Those activities that are necessary to sustain the integrity of a removal action following its conclusion. The term includes, but is not limited to, activities such as relighting gas flares, replacing filters, and collecting leachate.

Potentially Responsible Party (PRP)	An individual(s) or company(ies) (such as owners, operators, transporters, or generators) potentially responsible for, or contributing to, the contamination problems at a CERCLA site. Whenever possible, EPA requires PRPs , through administrative and legal actions, to clean up hazardous waste sites they have contaminated.
Preliminary Assessment (PA)	The process of collecting and reviewing available information about a known or suspected release of a hazardous substance, or pollutant or contaminant. DOE uses this information to determine if the site requires further study. If further study is needed, a site inspection is undertaken.
Radiological Assistance Teams (RATs)	Specialized response and support teams established by EPA's Office of Radiation Programs for incidents or sites containing radiological hazards. Expertise is available in radiation monitoring, radionuclide analysis, radiation health physics, and risk assessment.
Regional Contingency Plans (RCPs)	Regional plans to coordinate timely, effective response by various federal agencies and other organizations to discharges of oil or releases of hazardous substances, or pollutants or contaminants. RCPs are developed by the RRTs working with the States.
Regional Response Teams (RRTs)	RRTs provide regional planning and coordination of preparedness and response actions. They are comprised of standing teams, consisting of representatives from each of 14 federal agencies and state and local governments, and incident-specific teams formed from the standing team when the RRT is activated for response.

Release Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant), but excludes: any release that results in exposure to persons solely within a workplace, with respect to a claim that such persons may assert against the employer of such persons; emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine; release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954, if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under section 170 of such Act, or, for the purposes of section 104 of CERCLA or any other response action, any release of source, byproduct, or special nuclear material from any processing site designated under section 102(a)(1) or 302(a) of the Uranium Mill Tailings Radiation Control Act of 1978;. and the normal application of fertilizer. This includes abandoning/discarding any type of receptacle containing substances or the stockpiling of a reportable quantity of a hazardous substance in an unenclosed containment structure. In conducting a removal action, release also means threat of release.

Remedial Action (RA) The actual construction or implementation phase that follows the remedial design of the selected cleanup alternative at a site.

Remedial Investigation/ Feasibility Study (RI/FS) Investigative and analytical studies usually performed in an interactive process during a remedial response at a hazardous substance release. They are intended to:

- Gather the data necessary to determine the type and extent of contamination at a CERCLA site
- Establish criteria for conducting a remedial action at the site
- Identify and screen cleanup alternatives for remedial action
- Analyze in detail the technology and costs of the alternatives.

Removal Action	<p>A response taken over the short-term to address a release or threat of release of a hazardous substance. EPA has categorized removal actions in three ways:</p> <ul style="list-style-type: none">• Emergency removal actions are necessary when there is a release that requires on-site activities to begin within hours or days• Time-critical removal actions are taken in response to releases requiring on-site action within six months• Non-time-critical removal actions are taken when a removal action is determined to be appropriate, but a planning period of at least six months is available before on-site activities must begin.
Removal Site Evaluation (RSE)	<p>A process to determine if a removal action is necessary. This evaluation includes a preliminary assessment and, if necessary, a site inspection.</p>
Reportable Quantities (RQs)	<p>The quantity of a hazardous substance that, if released into the environment, may present substantial danger to human health, welfare, or the environment and must be reported to the National Response Center or EPA. RQs for CERCLA hazardous substances are listed in 40 CFR Part 302, Table 302.4.</p>
Sampling and Analysis Plan	<p>If environmental samples are to be collected during a removal action, DOE must develop a sampling and analysis plan that provides a process for obtaining data of sufficient quality and quantity to satisfy data needs. Sampling and analysis plans consist of two parts:</p> <ul style="list-style-type: none">• Field Sampling Plan, which describes the number, type, and location of samples and the type of analyses• Quality Assurance Project Plan (QAPP), which describes policy, organization, and functional activities and the data quality objectives and measures necessary to achieve adequate data for use in planning and documenting the removal action.
Site Inspection (SI)	<p>An on-site investigation to determine whether there is a release or potential release and the nature of the associated threats. The purpose is to augment the data collected in the preliminary assessment and to generate, if necessary, sampling and other field data to determine if further action or investigation is appropriate.</p>

State Environmental Response Commission (SERC)	As required by the EPCRA, SERCs are appointed by the Governor of each state to designate emergency planning districts; appoint, supervise, and coordinate the activities of the LEPCs; and review local emergency response plans. SERCs also establish procedures for receiving and processing requests from the public for information generated from EPCRA reporting requirements and designate an official to serve as coordinator for information.
Threshold Planning Quantity (TPQ)	The amount of an EHS which, if present at a facility, subjects that facility to the emergency planning requirements of SARA sections 302 and 303.